



06 February 2012

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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: LightSquared Petition for Declaratory Ruling
IB Docket No. 11-109; ET Docket No. 10-142

Dear Ms. Dortch:

On behalf of Exicon Ltd, I am writing in support of the Petition for Declaratory Ruling filed by LightSquared Inc. on December 20, 2011 and placed on public notice by the Commission on January 27, 2012.

As the Commission knows, LightSquared will operate its planned 4G LTE wireless on a wholesale basis. This approach will enhance competition significantly by facilitating the ability of new providers to enter local, regional, and nationwide markets and serve consumers. For example, in the case of Exicon Ltd. and its clients.

Exicon Ltd. is a mobile solutions provider. The company is matchmaker between marketers / enterprises and qualified developers to generate smartphone Apps and APIs through our online platform and advisory services.

In our opinion, wholesale mobile network operation brings a whole new business model to the arena.

In addition, taking the fast smartphone adoption into account, we believe mobile communication is the future and will drastically improve productivity for all kinds of businesses and private purposes.

However, LSQ also has spectrum capacity to support the increased demand in data traffic over the wireless network. Its wholesales business model will enable partners and enterprises to go mobile faster, thereby creating future oriented jobs in the US.

Through the global thought and practice leadership that LSQ is providing with its business model, true innovation is delivered by offering new services with existing assets. This in the future will give the US more exports and an even stronger basis of human capital.

More specifically, this wholesale-only model will allow LightSquared's partners to overcome the high barriers to market entry—including potentially prohibitive network deployment and roaming costs, as well as spectrum scarcity—that could otherwise unduly raise their operating costs, or preclude them from operating altogether.

By affirming LightSquared's rights as described in the Petition, the Commission would facilitate our ability to deliver the tangible benefits of more robust competition to consumers in the form of higher quality service, lower rates, and expanded voice and broadband service options.

At the same time, granting LightSquared's Petition would reinforce the integrity of the Commission's rules, and provide the regulatory certainty necessary for companies like Exicon Limited and LightSquared to attract investment and continue developing innovative communications solutions that truly benefit consumers. It bears emphasis that LightSquared's Petition does *not* ask the Commission to waive its rules or afford LightSquared special treatment in any way. Rather, the Petition merely asks the Commission to affirm its *existing* legal and policy framework for spectrum licensing and usage rights, which (i) has been in place for decades; (ii) formed the basis for the technical standards developed cooperatively by LightSquared and the commercial GPS industry almost a decade ago; and (iii) has been relied upon by LightSquared and its investors, customers, and others throughout the implementation of the LightSquared network.

Hundreds of millions of American consumers would benefit from the greater competition that would be made possible by LightSquared's network—consistent with the objectives of the *National Broadband Plan*. Accordingly, I urge the Commission to grant LightSquared's Petition on an expedited basis.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Stefan Rust', with a horizontal line drawn across the middle of the signature.

Stefan Rust, President & CEO
Exicon LLC